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HAKAN YUCESOIY, ABDI MAHAMMED,
MOKHTAR TALHA, BRIAN MORRIS, and
PEDRO SANCHEZ, individually and on behalf
of all others similarly situated

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

HAKAN YUCESOIY, ABDI MAHAMMED,
MOKHTAR TALHA, BRIAN MORRIS, and
PEDRO SANCHEZ, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC.,

Defendant.

CASE NO. 3:15-cv-00262-EMC

**STIPULATION AND ~~[PROPOSED]~~ ORDER
TO FILE REVISED THIRD AMENDED
COMPLAINT**

Judge: Hon. Edward M. Chen

1 Pursuant to Civil Local Rule 7-12, the undersigned counsel of record for Plaintiffs Hakan Yucesoy,
2 Abdi Mahammed, Mokhtar Talha, Brian Morris, and Pedro Sanchez (“Plaintiffs”) and Defendant
3 Uber Technologies, Inc. (“Defendant”) (collectively, the “Parties”) stipulate and agree as follows:

4 WHEREAS, on December 1, 2015, Plaintiffs filed a Third Amended Complaint (Doc. No.
5 141), in which they did not name Travis Kalanick as a Defendant, based upon Uber’s representation
6 that Mr. Kalanick is not Uber’s “President”;

7 WHEREAS, Plaintiffs’ counsel has since discovered that Mr. Kalanick was listed as Uber’s
8 “President” in corporate filings with the California Secretary of State as recently as 2014;

9 WHEREAS, in light of these facts, Uber has agreed to stipulate to Plaintiffs adding Mr.
10 Kalanick back into the Third Amended Complaint as a Defendant for purposes of Plaintiffs’ Mass.
11 Gen. L. § 148B claim only, while reserving all rights and arguments with respect to Mr. Kalanick;

12 IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s approval, that:

- 13 (1) The revised Third Amended Complaint attached hereto as Exhibit 1 is hereby deemed
14 filed.

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16 In accordance with Local Rule 5-1, the filer of this document hereby attests that the
17 concurrence to the filing of this document has been obtained from the other signatories hereto.
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2 Dated: December 22, 2015

SHANNON LISS-RIORDAN
ADELAIDE PAGANO
LICHTEN & LISS-RIORDAN, P.C.

4 MATTHEW CARLSON
5 CARLSON LEGAL SERVICES

6 By: /s/ Shannon Liss-Riordan

7 Attorneys for Plaintiffs
8 HAKAN YUCESOI, ABDI MAHAMMED,
9 MOKHTAR TALHA, BRIAN MORRIS, and PEDRO
10 SANCHEZ, individually and on behalf of all others
11 similarly situated,

12 Dated: December 22, 2015

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16 KEVIN J. RING-DOWELL
17 GIBSON, DUNN & CRUTCHER LLP

18 By: /s/ Theodore J. Boutrous, Jr.

19 Attorneys for Defendant
20 UBER TECHNOLOGIES, INC.

21 **PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.**

The Third Amended Complaint
shall be filed as a separate
document.

23 12/23/15

24 Date: _____

Hon. Edward M. Chen

